


entire data set. For each analyte, the data will be evaluated for potential outliers and data distribution using EPA's ProUCL statistical software. Based on the data distribution of each analyte, an appropriate statistic such as an Upper Tolerance Limit (UTL) or similar statistic will be calculated using ProUCL for each analyte. The resulting statistic is proposed to be used as the site-specific background concentration for that analyte.

The need for additional background soil sampling will be addressed after the data from the proposed background study and the site soil investigation are evaluated.

RATIONALE FOR REFINEMENT/MODIFICATION:

This WRN proposes alternative background soil sampling areas based on feedback from Harris County Pollution Control Services, EPA and TCEQ. In addition, as specified in the RI/FS work plan, this WRN provides details of the background soil sampling, including sample locations, the COPCs to be analyzed and the statistical methods to be used to evaluate the background soil analytical data.

Respondents' Project Coordinator: _____


Eric Pastor
Pastor, Behling & Wheeler, LLC

Date: _____

10/12/16

EPA Project Manager: _____

Raji Josiam

Date: _____